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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**In re: DATA BREACH SECURITY
LITIGATION AGAINST CAESARS
ENTERTAINMENT, INC.**

Master File No. 2:23-cv-01447-ART-BNW

(Consolidated for pre-trial proceedings with
Case Nos. 2:23-cv-01482, 2:23-cv-01483,
3:23-cv-00470, and 2:23-cv-01562)

**PLAINTIFF TODD KATZ'S MOTION TO
CONSOLIDATE FOR PRE-TRIAL
PROCEEDINGS**

TODD KATZ, individually and on behalf
of all others similarly situated,

Civil Action No. 2:23-cv-01836-GMN-NJK

Plaintiff,

v.

CAESARS ENTERTAINMENT, INC.,

Defendant.

Pursuant to Rule 42 of the Federal Rules of Civil Procedure and Paragraph 4 of the Court's October 26, 2023 Order Consolidating Cases (ECF No. 21) in the action captioned *In re: Data Breach Security Litigation Against Caesars Entertainment, Inc.*, Master File No. 2:23-cv-01447-ART-BNW (D. Nevada) ("Consolidated Action"), Plaintiff Todd Katz ("Plaintiff") through his counsel, files this [Unopposed] motion to consolidate his action ("Plaintiff's Action") into the Consolidated Action. In support of the Motion, Plaintiff states as follows:

WHEREAS, Plaintiff's Action arises from the same subject matter as the Consolidated Action, alleges substantially similar facts and claims, and has proposed class definitions that will encompass the same persons;

WHEREAS, all parties in the Consolidated Action do not at this time oppose procedural consolidation of Plaintiff's Action into the Consolidated Action for pre-trial proceedings under Fed. R. Civ. P. 42(a);

WHEREAS, the parties anticipate that additional actions may be filed in or transferred to this District, and believe that a streamlined procedure to have any such cases consolidated into the Consolidated Action would promote efficiency, judicial economy, and conserve resources;

WHEREAS, in an effort to ensure consistent rulings and decisions and to avoid unnecessary duplication of effort, Plaintiff, without opposition, moves this Court for entry of an order consolidating Plaintiff's Action into the Consolidated Action, and all actions that may subsequently be filed in or transferred to this District arising from the same subject matter, for pre-trial proceedings;

NOW, THEREFORE, Plaintiff submits the following to the Court for approval:

1. The following action is hereby consolidated for all pre-trial proceedings into the Consolidated Action, captioned *In re Data Breach Security Litigation Against Caesars Entertainment, Inc.*, Master File No. 2:23-cv-01447-ART-BNW (D. Nevada):

- i. *Katz v. Caesars Entertainment, Inc.*, Civil Action No. 2:23-cv-01836-GMN-NJK (D. Nevada).

2. If a case arising out of the same subject matter as the Consolidated Action is or has been subsequently filed in this District or transferred from another District, it will be consolidated into this action and administratively closed, without further order of the Court. A party in such action wishing to object to consolidation must file an application for relief from this order within ten (10) days after the date on which the party's counsel receives a copy of this order.

Dated: November 16, 2023

Respectfully submitted,

/s/ Nathan R. Ring

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